

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELEVEN MILLION SEVENTY-ONE
THOUSAND ONE HUNDRED AND
EIGHTY-EIGHT DOLLARS AND SIXTY-
FOUR CENTS (\$11,071,188.64) IN UNITED
STATES CURRENCY, MORE OR LESS,
SEIZED FROM LAOSTRICHES & SONS,
INC.,

Defendant-in-rem.

CIVIL NO. 4:12CV1559 (CEJ)

UNITED STATES OF AMERICA’S MOTION FOR SUMMARY JUDGMENT

COMES NOW, the United States of America, and, pursuant to Fed. R. Civ. P. 56 and for the reasons more fully set forth in the accompanying memorandum of law, moves for judgment as a matter of law.

WHEREFORE the United States respectfully moves the Court to grant its motion for summary judgment, and strike the claim and answer filed by claimant, Laura Avila-Barraza for lack of standing and ownership.

Respectfully submitted,

In St. Louis, Missouri, this 21st day of April, 2014.

JAIKUMAR RAMASWAMY, Chief
Asset Forfeiture and
Money Laundering Section

/s/: Aixa Maldonado-Quñones
Aixa Maldonado-Quñones
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of April, 2014, a true and exact copy of this motion was sent via ECF: **Alan S. Ross**, Esq., Robbins, Tunkey, Ross, Amsel, Raben & Waxman, PA, 2250 SW Third Avenue, Fourth Floor, Miami, FL. 33129.

/s/ Aixa Maldonado-Quñones
Aixa Maldonado-Quñones